

Mario N. Alioto (56433)  
Joseph M. Patane (72202)  
Lauren C. Capurro (241151)  
**TRUMP, ALIOTO, TRUMP & PRESCOTT LLP**  
2280 Union Street  
San Francisco, CA 94123  
Telephone: (415) 563-7200  
Facsimile: (415) 346-0679  
malieto@tatp.com  
jpatane@tatp.com  
lauren russell@tatp.com

*Lead Counsel for Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master No.: 3:07-cv-05944-SC  
MDL No. 1917

This Document Relates to:  
  
All Indirect Purchaser Actions

**DECLARATION OF LAUREN C.  
CAPURRO IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5**

Date: October 5, 2016  
Time: 11:00 a.m.  
Before: Special Master Martin Quinn  
Court: JAMS

Judge: Honorable Jon S. Tigar

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to  
3 practice before this Court. I am an associate with the law firm Trump, Alioto, Trump &  
4 Prescott, LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs  
5 (“IPPs”) in the above-captioned action. I make this declaration in support of the IPPs’  
6 Administrative Motion to File Under Seal Pursuant to Civ. L. R. 7-11 and 79-5(d). Except  
7 where otherwise stated, the matters set forth herein are within my personal knowledge and  
8 if called upon and sworn as a witness I could competently testify regarding them.

9 2. I have reviewed and complied with the Honorable Jon S. Tigar’s Standing  
10 Order Governing Administrative Motions to File Materials Under Seal (“Standing Order”) and  
11 Civil Local Rule 79-5.

12 3. Pursuant to the Standing Order and Civil Local Rules 7-11 and 79-5(d), IPPs  
13 seek to file the the following Exhibits to the Declaration of Lauren C. Capurro in Support of  
14 Opposition to Motion to Strike Declaration of Mario N. Alioto in Support of Lead  
15 Counsel’s Omnibus Response to Objections to Proposed Allocation of Aggregate Fee  
16 Award to Indirect Purchaser Plaintiffs’ Counsel (“Capurro MTS Declaration”), or portions  
17 thereof, under seal:

- 18 • the entirety of Exhibits 1 and 2;
- 19 • portions of Exhibit 6;
- 20 • the entirety of Exhibits 7, 8 and 9;
- 21 • the entirety of Exhibits 11, 12 and 13.

22 4. The documents or portions of documents listed in paragraph 3 that IPPs  
23 seek to file under seal contain IPPs’ highly confidential attorney work product, including  
24 attorney mental impressions, strategy and thought processes. Such attorney work product  
25 is privileged and is entitled to protection from disclosure to the general public and adverse  
26 parties. *See Hickman v. Taylor*, 329 U.S. 495, 510-512 (1947). The documents or portions  
27 of documents therefore qualify as “privileged, protectable as a trade secret or otherwise  
28 entitled to protection under the law,” under Civil Local Rule 79-5(b).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 30th day of September, 2016 at San Francisco, California.

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Lauren C. Capurro